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FEDERAL BAR NO. MF-2326
MG-4261

Attorneys for CIGNA

RAVI PATEL,

Plaintiff,

v.

CIGNA CORPORATION AND TAC
PROFESSIONAL STAFFING
SERVICES, INC. d/b/a EDP
CONTRACT SERVICES,

Defendants.

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

CIVIL ACTION NO. 02-CV-6141 (JBS)

**CERTIFICATION OF
MICHAEL E. GOGAL, ESQ.**

I, MICHAEL E. GOGAL, ESQ., of full age, certify as follows:

1. I am an attorney licensed to practice law in the State of New Jersey and an associate with the law firm of Riker, Danzig, Scherer, Hyland & Perretti, LLP, counsel for defendant Connecticut General Life Insurance Company ("CIGNA"), in the above captioned matter. I make this Certification in support of CIGNA's motion for summary judgment.

2. Attached hereto as Exhibit A is a true and accurate copy of plaintiff Ravi Patel's First Amended Complaint and Jury Demand.

3. Attached hereto as Exhibit B is a true and accurate copy of the Master Information Processing Time and Materials Consulting Services Agreement between defendants EDP and CIGNA dated April 1, 2000.

4. Attached hereto as Exhibit C is a true and accurate copy of excerpts from plaintiff Ravi Patel's April 30, 2003 deposition (Patel Dep. I).

5. Attached hereto as Exhibit D is a true and accurate copy of excerpts from plaintiff Ravi Patel's May 14, 2003 deposition (Patel Dep. II).

6. Attached hereto as Exhibit E is a true and accurate copy of excerpts from plaintiff Ravi Patel's September 11, 2003 deposition (Patel Dep. III).

7. Attached hereto as Exhibit F is a true and accurate copy of the Task Order for Consulting Services between defendants EDP and CIGNA dated February 1, 1999.

8. Attached hereto as Exhibit G are true and accurate copies of three Contract Employee Agreements between defendant EDP and plaintiff dated November 13, 1998, May 24, 1999 and November 5, 1999.

9. Attached hereto as Exhibit H is a true and accurate copy of defendant EDP's "Discrimination and Harassment in the Workplace."

10. Attached hereto as Exhibit I is a true and accurate copy of the EEOC's June 28, 2002 Determination.

11. Attached hereto as Exhibit J is a true and accurate copy of the EEOC's Sexual Harassment Questionnaire completed by plaintiff.

12. Attached hereto as Exhibit K is a true and accurate copy of an internal EEOC e-mail dated September 3, 2002.

13. Attached hereto as Exhibit L is a true and accurate copy of excerpts from Bruce Kline's September 19, 2003 deposition (Kline Dep.).

14. Attached hereto as Exhibit M is a true and accurate copy of handwritten notes from Bruce Kline, Team Leader for CIGNA's Voorhees facility.

15. Attached hereto as Exhibit N is a true and accurate copy of Robert Gowman's September 19, 2003 deposition (Gowman Dep.).

16. Attached hereto as Exhibit O is a true and accurate copy of Robert Gowman's handwritten notes.

17. Attached hereto as Exhibit P is a true and accurate copy of two time cards completed by Ravi Patel on defendant EDP's forms.

18. Attached hereto as Exhibit Q is a true and accurate copy of plaintiff Ravi Patel's resume as provided to defendants.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

s/Michael E. Gogal
Michael E. Gogal

Dated: March 1, 2005

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